

EXHIBIT E

**UNITED STATES DISTRICT COURT FOR THE
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL No. 3:16-md-2738-MAS-LHG

JUDGE MICHAEL A. SHIPP
MAG. JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

Civil Case No. 3:20-cv-03797-MAS-LHG

DIANA LYNN LIPTON v. JOHNSON &
JOHNSON, et al.

**DECLARATION OF BENNETT MOXON AS CO-SUCCESSOR-IN-INTEREST
PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE SECTION
377.32**

I, Bennett Moxon, declare as follows:

1. The decedent in this matter is Diana Lynn Lipton. She was my sister.
2. Diana Lynn Lipton died of ovarian cancer on December 8, 2022, in Santa Rosa, California.
3. A true and correct copy of the death certificate, with social security number redacted, is attached as Exhibit A to the instant Motion to Substitute Party-Plaintiff.
4. “No proceeding is now pending in California for administration of the decedent’s estate.”

5. I am one of the decedent's successors-in-interest (as defined by section 377.11 of the California Code of Civil Procedure) and a co-successor, along with my siblings Evelyn Willner, Heidi Moxon Morishita, and Linda Moxon, to the decedent's interest in this action.
6. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in

Long Beach, California on the date specified below.

Dated: August 24, 2023


Bennett Moxon